

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	CASE No. 20-50805-rbk
KRISJENN RANCH, LLC	§	
	§	CHAPTER 11
DEBTOR.	§	(Jointly Administered)

KRISJENN RANCH, LLC, ET AL.	§	
	§	
PLAINTIFFS,	§	
	§	Adversary No. 20-05027-rbk
vs.	§	
	§	
DMA PROPERTIES, INC. ET AL.	§	
	§	
DEFENDANTS.	§	

**PLAINTIFFS’ WITNESS AND EXHIBIT LIST FOR CONTINUED HEARING ON
MOTION FOR SATISFACTION OF ATTORNEY’S FEES JUDGMENT
SET FOR WEDNESDAY, AUGUST 6, 2025 AT 10:00 A.M. (CT)
(Reference Docket No. 457)**

KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (Collectively, “KrisJenn”); and Larry Wright (“Wright”) (together, the “Plaintiffs”) reserves the right to call any or all of the following as witnesses at the above-referenced hearing, including, but not limited to, by affidavit, declaration, or proffer.

1. Any witness called or designated by any other party; and
2. Any rebuttal or impeachment witnesses, as appropriate.

The Plaintiffs reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

No.	Exhibit	Offered	Admitted
P-1	Interim Order Granting in Part and Denying in Part Wright's Motion for Satisfaction of Attorneys' Fees Judgment (Docket No. 473)		
P-2	Transcript of Hearings on July 2, 2025 at 10:00 a.m. (Relates to Docket Nos. 456, 457, 458, and 464)		
P-3	Engagement Letter with Vaquero Energy Holdings, LLC Dated July 2, 2025		
P-4	Signed Order on Motions for Summary Judgment filed on July 22, 2025 <i>Re: Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, L.P.</i> ; Cause No. CV-00461-24-08; In the District Court of Angelina County; 159 th Judicial District		
P-5	Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457)		
P-6	Proposed Order Granting Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457-1)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

Plaintiffs reserve the right to supplement or amend the proposed exhibits as may be required. Plaintiffs further reserve the right to introduce any impeachment or rebuttal exhibit as may be required. Plaintiffs further reserve the right to call any witness introduced by any other party and to call any impeachment or rebuttal witness as may be required.

Dated: August 1, 2025

Respectfully submitted,

HAYWARD PLLC

By: /s/Charlie Shelton
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***Counsel for KrisJenn Ranch, LLC;
KrisJenn Ranch, LLC-Series Uvalde
Ranch; KrisJenn Ranch, LLC-Series
Pipeline ROW; and Larry Wright***

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2025, the foregoing was served via CM/ECF on all parties requesting such service. Additionally, on August 1, 2025, or within one business day thereof, the foregoing was served without exhibits via United States First Class Mail to the parties listed below.

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<i>United States Trustee</i>	<i>Counsel for Black Duck Properties, LLC</i>
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/s/ Charlie Shelton
Charlie Shelton